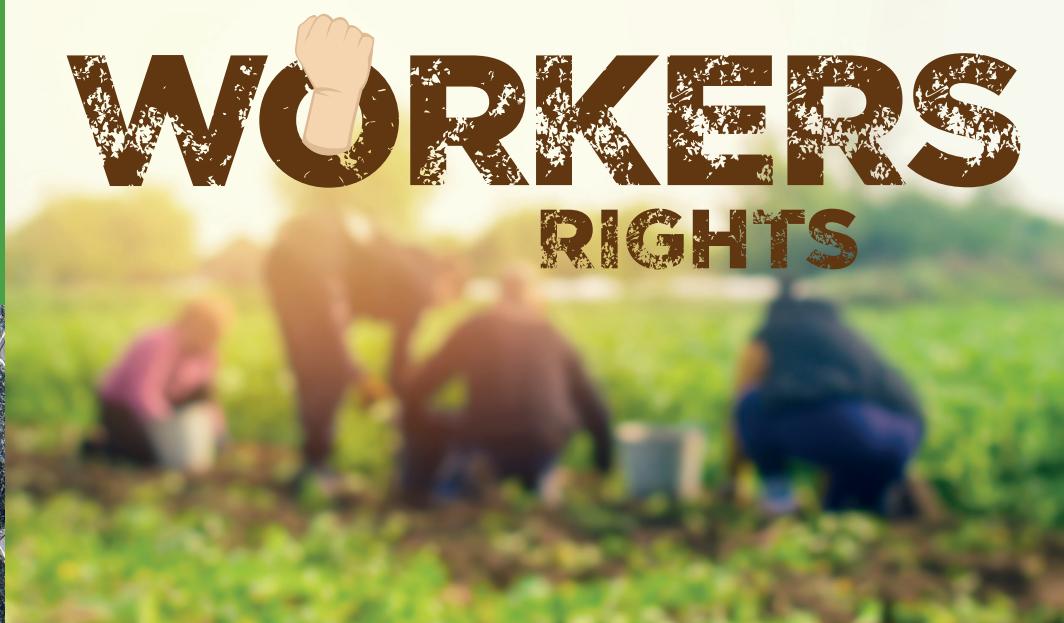
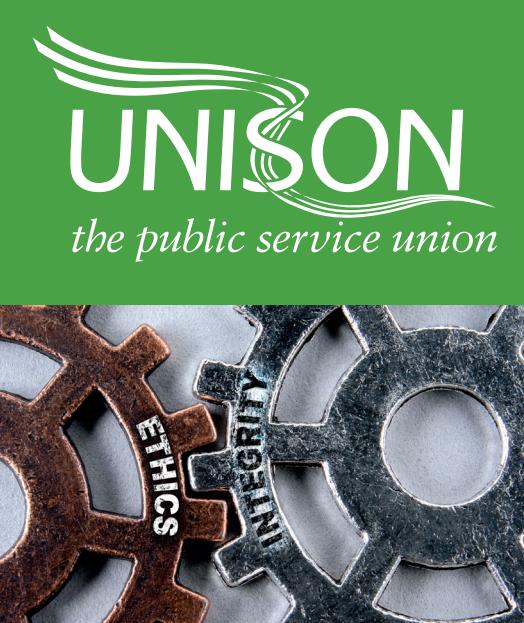


# UNISON Slavery and Human Trafficking Statement 2021



## Introduction

This statement is made under section 54 of the Modern Slavery Act 2015 and constitutes UNISON's slavery and human trafficking statement for the financial year beginning 1st January 2021 and ending 31st December 2021.

This statement provides an update on progress made since our last statement and sets out our planned actions to continue to ensure that slavery and human trafficking are not taking place in either our core operations or our supply chains.

## 1. UNISON's structure, business and supply chains

UNISON is the UK's largest trade union representing and acting for 1.3 million fee paying members who work to provide a wide range of public services and utilities, whether they're employed by private companies, public authorities or in the community and voluntary sector. UNISON has approximately 1,200 employees and an annual turnover in excess of £36m.

We represent members, negotiate and bargain on their behalf, campaign for better working conditions and pay, for public services and among other things, advocate for responsible business conduct in law and practice at home and abroad.

### UNISON's Structure

The union is organised nationally, regionally and at branch level. Policy can be developed at national, regional or branch level, by service groups or by self-organised groups, each within their own 'sphere of influence', providing it complies with UNISON's rules. The union's head office is in London. There are 31 regional offices and premises, and over 800 branches. UNISON branches are made up of elected volunteers that represent members within that branch.

UNISON is governed by lay members who are elected every two years by the membership to sit on the National Executive Council (NEC). The NEC and its sub-committees guide our strategic direction and provide approval for annual work plans and large scale projects based on the policy motions set annually by our representative members at our National Delegate Conference.

Each service group (Local Government, Health, Higher Education, Police & Justice, Energy, Education, Water, Environment & Transport, Community & Voluntary) also has its own elected lay Service Group members who oversee their service group's work plan which is set by the policy motions agreed by elected members to their annual conferences.

## Supply chains

The union's third-party supply chains include goods and services, mainly from providers based within the UK or EU, for the effective running of the organisation as well as the provision of affiliated services for our members.

UNISON purchases a wide range of goods and services that include legal services, IT hardware, IT services and software, furniture, stationery, electronics, travel services, printing, mailing, conference services, property and facilities services and catering. We recognise that modern slavery is usually hidden and that there are high risks of slavery linked to the global supply chains of the goods and services we procure.

UNISON's percentage of directly employed staff on permanent contracts is 97%. Due to the union's structure, there is a mixture of centralised and decentralised procurement. The responsibility for the majority of budgets and contracts is devolved to regional offices and departments but some are managed centrally. We are continuing to focus resources on categories where we have identified that the risks are highest, and working on improving the supplier data we collect centrally. We are also beginning to delve more deeply beyond Tier One within our electronics purchasing.

## Review and approval

UNISON's Slavery and human trafficking statement applies to the calendar year January 1st – December 31st. It is reviewed and published annually each April. UNISON has an internal modern slavery advisory group comprised of representatives from procurement, international, human resources and a staff trade union representative (agreed by joint national trade union body). The key purpose of this working group is to set key performance indicators and assess progress made against these, to drive and monitor continuous improvement in the union's practices in this area. This statement has therefore been developed in consultation with the union's modern slavery advisory group.

UNISON's Finance and Resource Management Committee (FRMC) is tasked with reviewing annual progress and agreeing new KPIs. The International Committee is also informally consulted on progress. The Chair of the FRMC signs UNISON's Modern Slavery Statement.

## 2. UNISON Slavery and Human Trafficking Policies

UNISON is committed to ensuring no slavery or human trafficking exists within any part of its business or its supply chains. The union strives to achieve this through its recruitment policies and procedures and supplier due diligence processes. For third-party suppliers our priority is to focus on high risk industries and categories and collaborate strategically with others to concentrate our resources and increase leverage with brands.

To help us focus on the most salient modern slavery risks within our supply chains, we are using the Ethical Trade Initiative's (ETI) Due Diligence Framework to guide and influence our work.

UNISON has a Supplier Code of Conduct (Appendix A) which sets out the Ethical Trade Initiative (ETI) Base Code as the minimum labour standards expected for its suppliers to meet or work towards, as well as requiring compliance with the Modern Slavery Act.

### ETI Base Code

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

### Procurement Policy

UNISON's internal Procurement Policy contains additional modern slavery commitments to meet the requirements of the Modern Slavery Act. Our Procurement Policy and Supplier Code of Conduct are reviewed on an annual basis. Our suppliers' human resource policies and practices are assessed throughout the procurement process by a supplier questionnaire and during tender interviews and supplier visits as appropriate.

### Policies

UNISON's international policy is determined by the National Delegate Conference (NDC) which supports workers in the global south to access their rights and campaign in support of public services and corporate accountability. This enables UNISON to work with international human rights and labour rights' groups and offers support to international partners to challenge labour and human rights' violations in countries identified as priority countries, or countries strategic to our international business and human rights strategy.

We are affiliated to a number of relevant organisations including Electronics Watch, Core Coalition, Anti-Slavery International, Banana Link, War on Want and Labour Behind the Label (part of the Clean Clothes Campaign).

UNISON naturally recognises that trade unions are essential to global efforts to tackle modern slavery by representing members and campaigning for decent work. We provide immigration advice to members in the UK and organise migrant workers to provide support, assistance and create a network for members that may be more vulnerable to exploitation.

UK Public Services procure around £280 billion a year, an enormous buying power contrasted to our own. As the largest union, including the largest public service union in

the UK, UNISON is working with our members to reform public service procurement policy and practice within their workplaces, to eradicate extreme exploitation and modern slavery through:

- An ethical procurement of public service goods strategy that includes a learning by doing tripartite training programme, to encourage public services employers e.g. local authorities, NHS, education etc. to improve how they procure. Three high risk supply chains have been targeted for in-depth work: solar panels, work wear and electronics. Working to the priorities of the relevant global union federations, we will work to encourage and support public service authorities to undertake specific beyond audit supply chain due diligence action on these products.
- UNISON has developed guidance and training to assist branch international officers to campaign for public service providers to develop ethical procurement policies. This includes a practical research report for local government and there are plans to develop further branch learning resources.
- The union continues to support calls for the Transparency in Supply Chains requirement of the Modern Slavery Act to be extended to public services. And has taken part in the articulation of a new Business, Human Rights and Environment Act, a human rights due diligence regulation to hold businesses and the public sector accountable should they cause harm. UNISON is developing policy for how the public sector should be treated within the Act.
- The union is supporting calls for an ILO convention on decent work in supply chains and helps to lead the UK Civil Society Working Group in support of the United Nations binding treaty on transnational corporations.

### Policies applying to UNISON recruitment and internal operations

UNISON employs solely within the UK. Our recruitment procedures ensure prospective employees are legally entitled to work in the UK. All successful applicants must produce their right to work documentation in line with the Right to Work Checklist published by the Home Office. This is a condition of employment and staff are not contracted until this has been produced and subsequently checked and verified by HR. This includes work permits and visas. If UNISON is in the process of applying for a work permit for a prospective member of staff, they cannot legally start work until it has been received.

An elected Staff Negotiations Committee is in place for its own operations, which follows a Terms of Reference and Constitution for negotiation, consultation and information purposes around pay, terms and conditions and health and safety.

UNISON recognises and collectively bargains its staff wages and terms and conditions – including most policies, with three unions, UNITE, NUJ and its independent staff union the Society of Union Employees (SUE). UNISON is an accredited real Living Wage Employer. Our real Living Wage Foundation accreditation ensures all direct and indirect employees are paid at least the Living Wage. To the best of our knowledge during this pandemic this continues to be the case. UNISON carries out reasonable and practical due diligence in the sourcing of goods and services.

### 3. Risk assessment, prevention and mitigation

UNISON understands that its largest exposure to modern slavery and human trafficking will come from its third-party supply chains.

The union's supplier vetting process requests information from potential suppliers to assess their suitability and provide evidence of their compliance of labour standards, the Modern Slavery Act and the Asylum and Immigration Act, as well as covering other areas of company information, policies and procedures. This enables the procurement team to identify and assess any potential risks. We continually review our vetting procedures and information provided by our suppliers. We are using the Ethical Trade Initiatives Due Diligence Framework to inform our processes to ensure focus is on suppliers from high-risk categories and industries.

#### Risk assessment procedures

We seek Key suppliers that share similar values as UNISON and declare their compliance with UNISON's Supplier Code of Conduct, which includes working towards the Ethical Trading Initiative (ETI) Base Code. UNISON does not permit its key suppliers to subcontract work except where prior permission has been obtained.

As contracts are renewed with key suppliers, we ensure that Modern Slavery Act requirements are included within the terms and conditions of contract. The terms and conditions of purchase include a clause confirming UNISON's commitment to ensuring slavery and human trafficking is not taking place. The union reserves the right to terminate its contracts if the supplier breaches the clause and slavery or human trafficking is found.

### 4. UNISON due diligence procedures in relation to Slavery and Human Trafficking in its business and supply chains

As a trade union, UNISON takes all labour rights violations as defined by the International Labour Organisation seriously. Whilst this statement is written for the purposes of the Modern Slavery Act, our practices and policies apply to all workers, as slavery can only exist in and absence of other labour rights and in particular Freedom of Association and Collective Bargaining. How we plan to manage and mitigate priority risks is written in the point above.

When relevant, we call upon various civil society partners for advice.

## 5. Training and capacity building on Slavery and Human Trafficking

All procurement staff are required to undertake and pass the CIPS Ethical Procurement and Supply e-learning and online test on an annual basis. For MCIPs Chartered staff this is a requirement to maintain their chartered status, but all procurement staff are required to complete this as a minimum.

We recognise the importance of a joined-up approach to addressing modern slavery issues across the union. The establishment of the internal modern slavery advisory group has assisted with the coordination of issues. The group strives to ensure continuous improvement and collectively agrees this statement.

Our Human Resources department has participated in awareness training so that we can focus on building modern slavery into our HR policies and procedures. We are continuing to look at mapping what agency staff have been used to decide on action that can be taken. We have held a webinar training session for key budget holders this year, and plan to hold a further webinars for other budget holders to highlight our modern slavery commitments and to provide additional advice and support for any concerns that might arise.

This year we have worked to include modern slavery awareness within the new staff induction booklet as well as new staff induction training, to engage with all new staff on modern slavery issues from the outset of their employment at UNISON.

## 6. Effectiveness, measured against appropriate KPIs

UNISON's business model is designed to seek to represent all our members wherever they work and whatever they do and campaign for the services they provide. Full objectives can be found in Appendix B. Therefore, gaining value for money, including on price is, like with all organisations, an important factor in how we operate. However, in line with our Procurement Policy, contract award decisions are not based only on price but include other relevant evaluation criteria.

UNISON is committed to better understanding its third-party supply chains.

Like many organisations UNISON's third-party supply chains are complex. Our priority and focus continues to be on understanding our supply chains, identifying areas of greater risk and vulnerability of workers and influencing where possible. We have high aspirations but limited resources and so our aim is to focus where we can make a difference. We will continue to engage with our third-party suppliers and to advocate and campaign for the strengthening of the national regulatory environment and its resourcing and seek to collaborate and learn from others.

During the COVID-19 pandemic UNISON has had to adapt the ways it works. During this period, resources have been focused on taking action to mitigate the impact of COVID-19 on workers and ensuring support and assistance is maintained for UNISON members - public sector workers providing frontline services. The union continues to take COVID-19 health and safety very seriously.

The COVID-19 pandemic has touched nearly every country in the world and continues to evolve. Like other organisations, the pandemic will have long term impacts on the union's operations and supply chains. This year we will work to assess any new modern slavery risks arising from the impact of the pandemic and any resulting changes to operations and supply chains.

We aim to further develop our performance measurements to support continuous improvement.

The table below tracks the past KPIs and actions and looks forward to our commitments in 2022.

## UNISON's Modern Slavery KPI Tracker

<b>Risk</b>	<b>KPI 2021</b>	<b>Action taken 2021</b>	<b>KPI 2022</b>
UNISON's procurement policy is out of date and unable to provide relevant direction	Procurement Policy to remain up to date – annual review process	Annual review completed January 2021 (no changes).	Procurement Policy to remain up to date – annual review process.
Supplier Code of Conduct is out of date and not mainstreamed into procedures	Code of Conduct to remain up to date – annual review process	Annual review completed January 2021 (no changes).	Supplier Code of Conduct to remain up to date – annual review process.
Supplier questionnaire does not include due diligence questions on modern slavery and risks cannot be identified	Supplier Questionnaire to remain up to date – annual review process	Annual review completed 2021.	Supplier Questionnaire to remain up to date – annual review process.
UNISON contract terms and conditions fail to incorporate modern slavery obligations	Terms and conditions remain up to date – regular review process	Modern Slavery Act clause reviewed as part of terms and conditions review 2021. Next review 2023.	
No framework to follow for due diligence process	To communicate and embed the new procedures and monitor compliance	New risk based due diligence framework for third party suppliers established and communicated to staff. Available on staff 'intranet' Teams site.	Embed risk-based supplier due diligence framework into practice with all contracts managed by the procurement team.

## UNISON's Modern Slavery KPI Tracker

<b>Risk</b>	<b>KPI 2021</b>	<b>Action taken 2021</b>	<b>KPI 2022</b>
Top suppliers not risk assessed, so no ability to identify or prioritise most at risk suppliers	Design and implement new contract management procedures based on plan of action	Plan of action is being developed.	Implement new contract management procedures based on plan of action, with top 10 suppliers assessed as most relevant.
Procurement staff are unaware of risks of modern slavery	Procurement team to continue to possess up to date knowledge and skills by carrying out annual CIPS ethical procurement training and also understanding of UNISON's strategy and procedures	New Due Diligence Framework training provided to procurement team March 2021.  Procurement team undertook CIPS ethical procurement training.	Procurement team to continue to possess up to date knowledge and skills by carrying out annual CIPS ethical procurement training and also understanding of UNISON's strategy and procedures. Refresher training to be carried out.
HR unaware of risk of modern slavery	HR staff to engage with regions and departments to seek a list of indirectly contracted staff to check the terms and conditions of agency workers. Brief staff on modern slavery.		MS mainstreamed into HR practice - HR staff to engage with regions and departments to seek a list of indirectly contracted staff to check the terms and conditions of agency workers.

## UNISON's Modern Slavery KPI Tracker

Risk	KPI 2021	Action taken 2021	KPI 2022
Staff are unaware of UNISON's and their responsibilities	<p>Continue with 2020 KPI. Modern Slavery Advisory Group to carry out webinars for all budget holders/ resourcing managers on their responsibilities.</p> <p>All staff to read a briefing on modern slavery and how it affects UNISON.</p>	<p>Webinar for key head office department completed September 2021.</p> <p>Staff email sent July 2021.</p>	Continue with 2020 KPI. Modern Slavery Advisory Group to carry out webinars for all budget holders/ resourcing managers on their responsibilities.
Suppliers are unaware of UNISON's and their obligations on modern slavery	Build supplier modern slavery awareness into contract management procedures	<p>General information provided to staff to enable conversations with suppliers.</p> <p>This work is ongoing.</p>	Build supplier modern slavery awareness into contract management procedures.
Electronics industry is a powerful high-risk industry infamous for modern slavery from mining to factories and more	Continue with 2020 KPI	Work in this area is ongoing.	Continue to gain transparency of UNISON's supply chain from brands.

## UNISON's Modern Slavery KPI Tracker

Risk	KPI 2021	Action taken 2021	KPI 2022
Whole union approach and response to modern slavery is not taken	Continue with 2020 KPI	Work in this area is ongoing.	Review of the capacity of the Modern Slavery Advisory Group and resources available to lead action plan to increase progress.

This statement has been approved by the union's Finance and Resource Management Committee.



**Daniel Sartin**, Chair of Finance and Resource Management Committee (NEC member)

## Appendix A – UNISON's supplier code of conduct

UNISON actively promotes the adoption of good labour standards, worker rights, equal opportunities and considers occupational health and safety a priority. Products and services must be produced and supplied under safe working conditions that do not involve abuse or exploitation of persons and in a manner that promotes sustainable practices and protects the environment.

UNISON seeks to work with suppliers that share the same values and standards for workers. As a minimum, UNISON seeks to engage suppliers that comply with all relevant legislation, including adherence to the Modern Slavery Act and have sound employment and working practices, including health and safety and environmental record.

UNISON is an accredited Living Wage Employer and seeks to work with organisations that pay a minimum of the Living Wage. UNISON will not work with suppliers (or their sub-contractors) that unlawfully discriminate against employees, or suppliers that prevent or discourage employees from joining trade unions.

UNISON expects its Suppliers to actively work towards applying the labour standards set out under the Ethical Trade Initiative (ETI) Base Code. This should include any sub-contractors. Suppliers should also have ethical audits carried out to demonstrate their commitment and identify any risks in this area. Suppliers must be able to demonstrate any corrective action/measures taken in the event of any non-compliance.

Suppliers are expected to have or be working towards having policies or statements on the following:

- Health and safety
- Environmental management (or sustainable practices/corporate social responsibility)
- Quality
- Employee policy and procedures including (but not limited to) training and development, apprenticeships, disciplinary, grievance and appeal, bullying and harassment.
- Equal Opportunities
- Trade Union recognition and staff consultation
- Transparency in supply chains (TISC) statement (as required by the Modern Slavery Act 2015) or other policy/statements in this area if not covered by the Act
- Business Continuity Planning
- Anti-corruption and anti-bribery
- Ensuring as far as is practicable, the eradication of the use of conflict minerals
- Data protection and security standards (if applicable)

UNISON reserves the right to exclude any suppliers from procurement processes if it is found that the organisation:

1. Is bankrupt or is the subject of insolvency or winding-up proceedings
2. Is in breach of legislation, such as labour, health and safety, environmental, social or data protection
3. Is found to have overstated achievements under their Modern Slavery Transparency Statement or on other publicly available material
4. Has attempted to unduly influence the decision making process,
5. Has negligently provided misleading information, withheld information or is not able to submit supporting information
6. Has entered into agreements with other organisations aimed at distorting competition

As well as requesting details of such policies and statements UNISON will request information on employment practices and may wish to test the information provided. Depending on the contract this may involve UNISON personnel speaking to employees and other clients and visiting supplier/client premises to test and validate information provided.

UNISON's suppliers must declare any relationship with UNISON staff that could be a potential conflict of interest.

We expect suppliers to maintain ethical controls over their business activity which ensures no risk of bribery or corruption within their personnel and their supply chain.

Suppliers must protect all sensitive information, including confidential, proprietary and personal information. Information should not be used for any purposes beyond the scope of the business arrangement.

UNISON's suppliers are required to comply with this Code of Conduct.

## Declaration of Supplier's Acceptance of UNISON's Supplier Code of Conduct

Compliance to UNISON's Supplier Code of Conduct is an essential prerequisite to becoming a supplier to UNISON.

On behalf of the supplier I confirm that:

1. We have received and read UNISON's Supplier Code of Conduct and in addition to our obligations under any contract(s) with UNISON we confirm our full compliance with the principles and requirements of the Supplier Code of Conduct.
2. We will effectively communicate the requirements of the Supplier Code of Conduct with our employees, agents and subcontractors as appropriate to ensure all requirements are implemented.
3. UNISON may request information and carry out visits/inspections of our facilities to ensure that all requirements are implemented accordingly and may ask for reconfirmation of compliance with the Supplier Code of Conduct when entering into a contract with UNISON.

I hereby certify that I am an authorised representative (delegated or otherwise) of the supplier and I am permitted to make these undertakings on behalf of the supplier.

Signed:

Full name and position in Company:

on behalf of (Name of Company):

Address:

Postcode

Telephone Number:

Date:

Please return this declaration to:

Procurement Team, UNISON Centre, 130 Euston Road, London, NW1 2AY.

Email: **purchasing@unison.co.uk**

## Appendix B – UNISON Objectives

UNISON, the largest union in the UK and one that is also growing, will seek to represent all our members wherever they work and whatever they do and campaign for the services they provide. We will call for additional funding across all public services to address social need.

Our key objectives are:

### **1. Recruitment and organising**

- Enhance our capability to recruit and retain members and meet the organising and representation challenges facing the union in the changing world of work.
- Ensure our union is relevant to all members who provide public services – including those who work in the community and private sectors.
- Identify and develop leadership and encourage union activism from across the union, particularly among young members and provide support and resources for them to lead campaigns
- Enhance our democracy by increasing and widening participation of our activists and members.
- Identify strategic growth areas such as social care and under-5s education and implement a national organising strategy in those sectors
- Encourage the recruitment of local stewards and Health & Safety representatives
- In all trade union activity to promote the benefits of the organising approach

### **2. Bargaining and equalities**

- Deliver increased funding for public services and secure real terms pay increases, improved terms and conditions, and high-quality employment and pensions for UNISON members.
- Build confidence for industrial action when required, identify and support strategic industrial disputes at national and branch level and seek to co-ordinate action wherever possible.
- Promote equal pay and equality in public, community and private sectors
- Actively challenge all forms of discrimination including racism and sexism; against LGBT+ people; against disabled people; and discrimination based on age, religion or social class.
- Provide support to migrant workers

- Bargaining and lobbying to end two-tier workforce in outsourced public services and rolling out a strategy to ensure national agreements are awarded to outsourced workers
- Provide assistance to those branches supporting outsourced members
- Campaign for better facility time arrangements for our members in public services

### **3. Campaigning and influencing**

- Campaign against climate change and work with other relevant organisations to achieve a net-zero carbon economy in the UK at the earliest opportunity and recognise that the Climate emergency is a trade union issue and commit to sharing our values in order to protect our planet.
- Develop our campaigns in support of quality publicly owned public services and in defence of the NHS, education, local government, social care, police, probation, Energy, WET and all public services including private and community sector
- Build our political influence, forging alliances with other unions and appropriate campaigning and community groups to challenge the austerity programme, including attacks on the welfare state.
- Campaign for the election of UK governments and councils that value public services and working people, rejecting the arguments of the Tory government and far right parties.
- Promote the new political fund arrangements to increase participation and opt-in.
- Promote the union's international work.

### **4. Building an efficient and effective union**

- Ensure that the union's structures including organisational, lay member, ICT infrastructure, digital and internal management systems and the distribution of our resources are accessible, efficient and effective to meet the changing needs of all sections of the union and its members especially in relation to global sustainability and to include the ability to take effective industrial action when required
- A root and branch review of the union's structure and operations taking account of climate change including travel, waste and efficiency
- Ensure that branches are provided with the support they need, promptly, when they need it